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FILE NO.: 11688.0006.

March 30, 2018

BY EMAIL

Sharon E. Kivowitz, Esq.
Office of Regional Counsel
US Environmental Protection Agency, Region 2
290 Broadway, 17th Floor
New York, New York 10007

Re: Unilateral Administrative Order for Remedial Design of OU-1– New
Cassel/Hicksville Groundwater Contamination Superfund Site
Index No. CERCLA-02-2018-2015

Dear Sharon:

On behalf of Arkwin Industries, Inc. (“Arkwin”), please accept this in response to the Environmental Protection Agency’s (“EPA”) March 22, 2018 letter and Administrative Order for a Remedial Design Index No. CERCLA-02-2018-2015: New Cassel/Hicksville Groundwater Contamination Superfund Site, OU1 (“Order”). Pursuant to Paragraph 46 of the Order, Arkwin requests a conference with EPA to discuss the Order, including its applicability to Arkwin, the factual findings and the determinations upon which the Order is based, the appropriateness of the actions EPA is purporting to order Arkwin to take and other relevant and material issues related to the Order.

This letter is subject to and without waiver of Arkwin’s defenses and/or claims and is not an admission of liability or responsibility. Feel free to contact my office if you have any questions.

Very truly yours,

s/Suzanne M. Avena

Suzanne M. Avena

cc: All PRP Counsel (via email)
D. French

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